CITY OF ELLENSBURG

Public Works Department
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October 28, 2005

Washington State Department of Ecology
Attn. Karen Dinicola
PO Box 47600
Olympia, WA 98504-7600

RE: Phase II Stormwater Permit Comments – Preliminary Draft

Dear Karen,

The City of Ellensburg has the following comments on the preliminary draft permit:

1) Page 11 (b. iii.) Lines 24-39.
   The topic of "irrigation water" was discussed at our meeting with you. This item really needs to researched and worded in an acceptable form. The Kittitas Valley is heavily irrigated. The opportunity for irrigation water to coexist with stormwater is a huge issue. The city currently encourages the separation of the storm and irrigation systems as development occurs; however, there is a large network of roadside ditches and existing irrigation tailwater ditches that flow into the existing city limits. Some of the receiving systems are irrigation and some are stormwater. To make a blanket statement that irrigation water shall be effectively prohibited from the MS4 sets the City of Ellensburg up for quite possibly an unfair situation with no solution.

   It is my understanding that you were going to revisit the actual EPA language and attempt to mitigate this requirement.

2) Page 12 (v. lines 18-31).
   The City of Ellensburg feels that municipal water should be able to be discharged to these MS4's. Chlorination levels are very low in the city's system and should be allowed as a way to deal with flushing, ect. It was my understanding that you were also going to review guidance from the American Water Works Association regarding this issue.

   "Swimming pool discharges should be directed to a sanitary sewer if available". This item should be deleted. Swimming pool water should be dealt with at the local agency level.

Thank you for the opportunity to provide these comments. Please feel free to contact me with any questions you may have.

Sincerely,

Ryan A. Lyyski
City Engineer

Cc   Correspondence
       File 01-053